

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the matter of:)

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Amendment of Part 97 of the Commission's)
Rules Governing the Amateur Radio Service
Concerning Permitted Emissions and Control) **RM-11306**
Requirements

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Comments Opposing RM-11306

By

Mr. Steven J. Gehring, NL7W

1.0 Background and Introduction

I, Steven J. Gehring, am an Extra Class amateur radio operator (NL7W), telecommunications professional, and am a member of the American Radio Relay League (ARRL). My opposition comments stem from experiences as a 22-year telecommunications professional – one who has worked for the U.S. government and private sectors as a telecommunications technician, engineer, consultant, and program manager. Currently, my telecommunications endeavors revolve around managing telecommunications research, development, testing, and evaluation (RDT&E) projects for the Department of Justice and our Nation's public safety organizations. The statements contained within are my own, and they do not necessarily reflect the views of any other individual or organization, including the ARRL.

2.0 Discussion

In my opinion, the ARRL has proposed several ill-conceived rule making changes to Part 97 in recent years. I believe a majority of their proposals have met with disfavor within the FCC, as well as with the Nation's amateur radio community as a whole. This current proposal, RM-11306, is no different; it is an ill-conceived proposal put forth by a singularly biased ad-hoc committee within the ARRL. This proposal is devoid of national, and to a lesser extent, international processes or program management. It lacks the proper technical and political vetting due such broad sweeping regulation changes contained within this proposal.

The ARRL proposal fails to adequately address radio mode incompatibilities of similar bandwidths. As mentioned in the proposal's conclusions, the ARRL states, "the

regulation of emission modes in Amateur Radio Service allocations is a limiting factor with respect to Amateur Radio experimentation. It leads to attempts to put new technology into regulatory framework that was designed to deal not with digital emissions, but rather with older, analog technologies." This statement is reasonable. The ARRL's proposal goes on to say, "the Commission's rules cannot efficiently prevent conflicts in HF spectrum usage or among amateur pursuing different interests. Of course, there must be mechanisms to minimize interference between analog and digital operation, since they cannot compatibly share the same channel or frequency range. However, the Commission's rules to subdivide the HF bands should be minimized." There appears to be a contradiction noted within this last quote from the ARRL proposal – mode incompatibility within the same frequency segment and their wanting to minimize similar bandwidth subdivision of said incompatible modes.

The ARRL believes that similar bandwidth emission types, say the most commonly used 3.5 KHz bandwidth, should not be subdivided at all - only by bandwidth. This means these similar bandwidth digital and analog emissions would have to peacefully co-exist. I, as well as many other leading technical engineers and hobbyists, do not believe this can happen – even given the ARRL's belief the amateur community can establish workable and acceptable sub-bands on their own. As of this proposal's submission, the ARRL has not publicly announced conjoining sub-band plans. Such band plans may have set aside many of the fears regarding the encroachment of digital semi-automatic and automatic robots into what has traditionally been used as analog voice segments throughout amateur radio high-frequency (HF) allocations.

3.0 Conclusion

This proposal must be rejected. Despite the ARRL's representation of numerous amateur radio operators around the country (myself included), they have not managed to poll members for their opinions, nor have they presented a nationally vetted proposal garnered through active radio clubs and well-known and respected amateurs from across the country. This proposal does not muster adequate support – a majority of active amateur radio operators within the United States. I am confident an overwhelming number of comments will come out against this poorly designed proposal.

If the ARRL put forth this proposal as a trail balloon, they have succeeded in rousing the interests of active amateur radio operators – causing debate within our community. I and many others look forward to reviewing a new petition – a vetted regulation-by-bandwidth proposal that separates analog and digital transmissions, and includes the clustering of similar bandwidth emissions and modes. Such a segmented plan, comprising of only bandwidth restrictions within said segments, could be the workable plan that promotes the development of the Radio Art as defined in 97.1, while continuing to effectively allow majority operations – the existing and long-standing modes of Morse code and single-sideband voice transmissions.

Respectfully submitted,

//signed//

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